

Exhibit A

**DANIEL VAZ-POCAS
XU and VAZ-POCAS vs PORSCHE CARS**

July 14, 2021

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1	IN THE UNITED STATES DISTRICT COURT	1	I N D E X
2	FOR THE NORTHERN DISTRICT OF GEORGIA	2	
3	ATLANTA DIVISION		PAGE
4	*****	3	
5	MICHAEL XU and DANIEL	4	DANIEL VAZ-POCAS
6	VAZ-POCAS, individually and	5	Examination by Mr. Goldberg
7	on behalf of all others	6	
8	similarly situated,	7	
9	Plaintiffs,	8	EXHIBITS
10		9	
11	V.	10	
12		11	NUMBER DESCRIPTION ID
13		12	Exhibit No. 1 Sales Agreement 7
14		13	Exhibit No. 2 Sales Agreement 7
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18		17	Exhibit No. 6 2012 Porsche Cayenne S
19		18	E2 I Vehicle Information 7
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24		23	to February 2017 7
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1	APPEARANCES:	1	NUMBER DESCRIPTION ID
2		2	Exhibit No. 12 Email chain - January 27,
3	FOR THE PLAINTIFFS:	3	2017 to January 31, 2017 8
4	BLOOD HURST & O'REARDON, LLP	4	Exhibit No. 13 Email - April 23, 2021 8
5	(APPEARING VIA ZOOM)	5	Exhibit No. 14 Email chain - February 2021
6	BY: PAULA R. BROWN, ESQUIRE	6	to March 2021 8
7	JAMES M. DAVIS, ESQUIRE	7	Exhibit No. 15 Email chain May 2017 8
8	501 West Broadway, Suite 1490	8	Exhibit No. 16 Email chain May 2017 8
9	San Diego, California 92101	9	Exhibit No. 17 Service Record 8
10	Phone: (619) 338-1100	10	Exhibit No. 18 Email May 22, 2017 8
11	Email: pbrown@bholaw.com	11	Exhibit No. 19 Email June 13, 2017 8
12	jddavis@bholaw.com	12	Exhibit No. 20 Safelite Auto Glass
13		13	Receipt 8
14	FOR THE DEFENDANT:	14	Exhibit No. 21 Safelite Auto Glass
15	DLA PIPER LLP	15	Invoice 8
16	(APPEARING VIA ZOOM)	16	Exhibit No. 22 Almeida's Auto Body
17	BY: MATTHEW A. GOLDBERG, ESQUIRE	17	Preliminary Estimate 8
18	TIMOTHY PFENNINGER, ESQUIRE	18	Exhibit No. 23 MTECH Motors, Inc.
19	1650 Market Street, Suite 5000	19	Invoice 9
20	Philadelphia, Pennsylvania 19103	20	Exhibit No. 24 Sambucci Brothers Long
21	Phone: (215) 656-3300	21	Island Quote 9
22	Email: matthew.goldberg@dlapiper.com	22	Exhibit No. 25 Plaintiff Daniel Vaz-Pocas'
23	timothy.pfenninger@dlapiper.com	23	Responses and Objections to
24	LEE HONG DEGERMAN KANG & WAIMEY	24	Defendant's First Set of
25	(APPEARING VIA ZOOM)	25	Interrogatories 9
	BY: ANIKA P. BRUNSON, ESQUIRE		
	3501 Jamboree Road, Suite 6000		
	Newport Beach, California 92660		
	Phone: (949) 250-9954		
	Email: anika.brunson@hlaw.com		

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<p style="text-align: right;">Page 41</p> <p>1 specifically, or were you -- was it more of a broader 2 search to get information on Porsche vehicles? 3 A. It started out broader. 4 Q. Okay. And this research, were you specifically 5 researching the 2012 model year Cayenne S or other model 6 years? 7 A. Other model years. It was that line, the 958. 8 Q. Okay. And did you do any specific research, 9 before buying the vehicle, on the 2012 model year 10 Cayenne S? 11 A. Yes. 12 Q. Okay. And tell me what that entailed. 13 A. So the same thing. I would dig a bit deeper 14 into some of the publications like MotorTrend and Car and 15 Driver on the specific 2012 after I found it. As well as 16 searching through forums, just on overall reliability, 17 performance, people's sentiment on the vehicle, and so 18 forth. 19 Q. And how did that research impact your decision 20 to ultimately buy the 2012 Cayenne? 21 A. It supported it. 22 Q. And you went -- you said you went to the forums 23 as well. Do you recall what forums you visited about the 24 2012 Cayenne S? 25 A. I believe it was Rennlist and 6speed.</p>	<p style="text-align: right;">Page 43</p> <p>1 Q. Did you research any other problems that Cayenne 2 owners are reporting online about their vehicles before 3 you purchased your car? 4 A. That's all I really found was the transfer case. 5 Q. Okay. 6 MR. GOLDBERG: Tim, let's pull up the complaint. 7 8 BY MR. GOLDBERG: 9 Q. Sir, we're going to show you a portion of the 10 complaint in this case. And we're going to direct you to 11 a specific paragraph, but if you want to review the whole 12 document or other parts of it, just, you know, feel free 13 to do that. 14 I'll direct you particularly to Paragraph 41, 15 where there are a bunch of complaints cited about the 16 Cayenne. And my question is whether you had seen any of 17 these complaints prior to buying your vehicle. 18 A. Okay. I'm pulling it up now. No, I had not 19 seen any of these in Paragraph 41. 20 Q. Okay. Okay. Let's talk about the first time 21 that you went to Town Motors. Did you just show up at 22 the dealership, or did you call beforehand and make an 23 appointment? 24 A. I called to make an appointment. 25 Q. Okay. And do you recall when you made that</p>
<p style="text-align: right;">Page 42</p> <p>1 Q. Did you do any search into problems Cayenne 2 owners were reporting online about their vehicles? 3 A. Yes. 4 Q. And I'm talking about the time period before you 5 bought it. 6 A. Yes. 7 Q. Tell me about what you saw and what you learned. 8 A. It was overwhelmingly focused on the transfer 9 case. From what I understand, the transfer case has a -- 10 what's considered to be a design flaw, at least in the 11 public world, where moisture can find its way into the 12 transfer case and degrade the internal gears or degrade 13 the fluid that protects the gears. And with time, that 14 transfer case could fail, which is a catastrophic, or 15 very expensive failure, I'll call it. 16 Q. Okay. And how did learning about that issue 17 impact your decision to ultimately purchase the 2012 18 Cayenne S? 19 A. It concerned me, to some extent. 20 Q. Okay. And so what did you do about that? 21 A. I decided to buy directly from a Porsche 22 dealership, and I stayed away from used car dealerships. 23 Because I felt that a Porsche dealership could inspect 24 and verify and ensure that it's not an issue or that it's 25 not an imminent failure.</p>	<p style="text-align: right;">Page 44</p> <p>1 call? 2 A. I believe it was probably late December -- it 3 may have been very early January 2017. It was right 4 around the New Year. 5 Q. Okay. And at the time you were making the 6 appointment, did you express interest in a particular 7 vehicle that Town Motors had on the lot? 8 A. Yes. 9 Q. Okay. And which vehicle was that? 10 A. The one I purchased. 11 Q. Okay. When was the first time you visited Town 12 Motors in person? 13 A. It was probably early to mid January. 14 Q. Okay. And when you first visited the 15 dealership, did you go by yourself? 16 A. Yes. 17 Q. Okay. And tell me about what happened during 18 that first visit. What did you do? 19 A. Sure. So I went to see the vehicle. Online 20 they had no pictures because the car had apparently just 21 been traded in. So I wanted to see it firsthand and see 22 if it was something I'd be interested in, since it was -- 23 since I wasn't able to see it online. So I went in. The 24 car was on the lift. The mechanic was looking at it, and 25 the representative who I met with took me into the</p>

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<p style="text-align: right;">Page 53</p> <p>1 Q. Okay. And what were your impressions having 2 reviewed those documents? Your impressions of the 3 vehicle. I'm sorry. 4 A. Impressions of the vehicle? 5 Q. Yes. 6 A. Impressed. I loved it. I think it was, as I 7 said, smooth. Really great vehicle, very comfortable. 8 Felt safe, felt secure. All-wheel drive was something 9 that was new to me but felt very -- very 10 confidence-inducing in terms of, you know, stability. 11 Definitely did not feel like an SUV. It felt like 12 something that was well planted and very premium. The 13 interior design was beautiful. Everything was great 14 materials, and I think it lived up to what I would have 15 expected from Porsche, which is, you know, pinnacle of 16 design, pinnacle of engineering, and pinnacle of 17 performance. 18 Q. Other than the repair inspection records that 19 you were provided that day, did the dealership give you 20 any other documentation about the vehicle? 21 A. Yes. 22 Q. And what was that? 23 A. The brochure. 24 Q. Can you be more specific? What brochure did you 25 receive?</p>	<p style="text-align: right;">Page 55</p> <p>1 Q. To sell the BMW? 2 A. No -- to sell the BMW, so I would only have the 3 one vehicle. 4 Q. And did you have any discussions with Town 5 Motors about trading in the BMW as part of your efforts 6 to acquire the Cayenne? 7 A. I believe they asked me, but I had no intention 8 of trading it in. 9 Q. Your preference was to try to sell the vehicle 10 privately? 11 A. Yes. 12 Q. Okay. And did you end up selling the BMW? 13 A. Yes. 14 Q. Okay. Besides the brochure and repair 15 inspection records, did Town Motors give you any other 16 documents about the vehicle on that visit? 17 A. Yes. There was the window sticker that had the 18 full feature list for that particular VIN. 19 Q. Okay. Anything else? 20 A. I don't believe so. 21 Q. I know I'm testing your memory here, but tell me 22 about what happened after the second visit. At that 23 point, had you made any decisions about the car, or did 24 you make an appointment to see it for a third time? Just 25 kind of walk me through, kind of, next steps.</p>
<p style="text-align: right;">Page 54</p> <p>1 A. So the 958 Cayenne advertising brochure. 2 Q. And did that brochure cover a specific model 3 year Cayenne? 4 A. I couldn't say. 5 Q. Do you still have that brochure? 6 A. I am unsure. I would have to check my files. 7 Q. So at the time you're looking at the Cayenne, 8 what vehicle were you driving? 9 A. A BMW 335i, 2008. 10 Q. And was that your only vehicle at that time? 11 A. No. I had a second. 12 Q. Okay. And what was that? 13 A. A '94 Honda Accord. 14 Q. So was the plan to -- if you got the Cayenne, to 15 get rid of one of those vehicles? Or were you going 16 to -- was your plan to hang on to all three of them? 17 A. No. Certainly get rid of -- and I'm trying to 18 recall if the Honda was sold before or after I bought the 19 Cayenne. I believe -- I believe the Honda Accord was 20 sold; I purchased the Cayenne. So at that time -- I 21 retract my statement. I only had the one vehicle, the 22 BMW. 23 Q. Okay. Got it. 24 A. To answer your question, the intention was to 25 sell that vehicle.</p>	<p style="text-align: right;">Page 56</p> <p>1 A. Well, that's where I'm struggling, because I 2 don't recall -- I know when my father and my wife were 3 with me, that's when I made the purchase. I don't recall 4 if that was the second visit or the third. And so on 5 that last visit where I purchased -- when I purchased the 6 vehicle, if that's the one you're interested in -- can we 7 assume that? 8 Q. I just wanted to know if you can remember if 9 there was a third visit or not. And I think your answer 10 is you're not sure; is that right? 11 A. I'm not sure. I know I went once by myself to 12 take a look at the vehicle while it was on the lift. I 13 know I went once with my father and my wife, and I made 14 the purchase that day. I don't recall if -- I believe I 15 test drove the vehicle that day. I don't recall if there 16 was a visit in the middle where I test drove. 17 Q. Okay. So did you -- is it fair to say you 18 purchased the vehicle on the day that you test drove it? 19 A. Yes. 20 Q. Okay. And do you remember what the vehicle 21 was -- what the list price was from the dealer on the 22 Cayenne? 23 A. Brand new, MSRP? 24 Q. No, the used vehicle price. 25 A. Oh. It was in the -- I believe it was around</p>

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<p style="text-align: right;">Page 57</p> <p>1 41. I think it was in the low 40s, 41,000. I believe.</p> <p>2 Q. Okay. And then you engaged in some negotiations</p> <p>3 with the dealer as to the price; correct?</p> <p>4 A. Correct.</p> <p>5 Q. Tell me about that. Tell me about what you</p> <p>6 discussed.</p> <p>7 A. Sure. I told him that I was comfortable</p> <p>8 spending 40,000; that was my budget out of pocket. And</p> <p>9 so I offered 40,000, and he stepped away to speak with</p> <p>10 his manager.</p> <p>11 Q. And what did he come back with?</p> <p>12 A. So he came back, and they spoke and said, well,</p> <p>13 "We're very close. I think we can make it work." And it</p> <p>14 was actually fairly simple. After they stepped away, I</p> <p>15 spoke with my father and my wife, just to get their</p> <p>16 opinion. And we decided to move forward.</p> <p>17 Q. All right.</p> <p>18 MR. GOLDBERG: We've been going for little bit</p> <p>19 more than an hour. How are you feeling? Would you like</p> <p>20 to take a short break to use the restroom, get a drink?</p> <p>21 Keep going?</p> <p>22 THE DEPONENT: I'm okay for the next 20 minutes</p> <p>23 if everyone else is.</p> <p>24 MR. GOLDBERG: Okay. Okay. Anybody else need a</p> <p>25 break? Okay. All right. Can we pull the sales</p>	<p style="text-align: right;">Page 59</p> <p>1 Q. And are those the items that the dealer agreed</p> <p>2 to fix on the vehicle as part of your purchase?</p> <p>3 A. Yes.</p> <p>4 Q. Did the dealer agree to fix anything else on the</p> <p>5 vehicle at that time that's not reflected here?</p> <p>6 A. Nothing is -- nothing specifically.</p> <p>7 Q. Okay.</p> <p>8 A. But he did -- I remember the representative did</p> <p>9 tell me if I find anything else, if there's any other</p> <p>10 issues, to let them know and they would take care of it,</p> <p>11 which they did.</p> <p>12 Q. Okay. So during the time when you were visiting</p> <p>13 the vehicle -- sorry, strike that -- visiting the</p> <p>14 dealership and making a decision on whether to purchase</p> <p>15 the vehicle, did you have any conversations with anyone</p> <p>16 at the dealership about what work they had done on the</p> <p>17 vehicle and what had been repaired?</p> <p>18 A. Just the representative that I worked with,</p> <p>19 William.</p> <p>20 Q. And I'm reading from -- you gave your</p> <p>21 interrogatory answers in this case. And I don't think I</p> <p>22 need to pull them up on the screen, unless you want to</p> <p>23 see them. But in your answer to Interrogatory No. 2, you</p> <p>24 said that, "Plaintiff also considered the information</p> <p>25 about the vehicle provided by Town Motors Porsche at the</p>
<p style="text-align: right;">Page 58</p> <p>1 agreement back up.</p> <p>2 BY MR. GOLDBERG:</p> <p>3 Q. So we're going to go back to the sales</p> <p>4 agreements again here.</p> <p>5 MR. GOLDBERG: Can you pull up 33, Bates 33.</p> <p>6 Okay. You can hold it right there.</p> <p>7</p> <p>8 BY MR. GOLDBERG:</p> <p>9 Q. Sir, is it fair to say that as part of your</p> <p>10 negotiations for the price that --</p> <p>11 A. I'm sorry. I'm not seeing a document.</p> <p>12 Q. I apologize. Okay. It will be Vaz-Pocas 33.</p> <p>13 MS. BROWN: Document 2.</p> <p>14 THE DEPONENT: Document 2. Okay. Thank you.</p> <p>15 BY MR. GOLDBERG:</p> <p>16 Q. And so if you go up to the first page of that</p> <p>17 document, on the left-hand side there's a column that</p> <p>18 says, "Package equipment." And then there's a whole bunch</p> <p>19 of N/As.</p> <p>20 A. Mm-hmm.</p> <p>21 Q. And then to me it says you gave a \$2,500 deposit</p> <p>22 and the "Dealer agrees to paint the front and rear</p> <p>23 bumper, paint rear deck lid, and replace rear tires." Is</p> <p>24 that -- am I reading that correctly?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 60</p> <p>1 time of sale, including confirmation that a full</p> <p>2 multipoint inspection was performed on the vehicle and</p> <p>3 all issues with the vehicle were addressed by Town Motors</p> <p>4 Porsche before the sale was completed."</p> <p>5 Okay. Did Town Motors represent to you that</p> <p>6 they had performed a full multipoint inspection on the</p> <p>7 vehicle prior to when you bought it?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And what does a multipoint inspection</p> <p>10 mean to you? What is that?</p> <p>11 A. I think it's different for each brand or each</p> <p>12 manufacturer. But to me it means that that brand went</p> <p>13 through the full inspection of all systems that they deem</p> <p>14 to be critical to the vehicle to ensure that it operates</p> <p>15 to standards, it operates safely, and it meets all of the</p> <p>16 brand's reputation requirements or standards.</p> <p>17 Q. Okay. And when you say "all issues with the</p> <p>18 vehicle were addressed by Town Motors Porsche before the</p> <p>19 sale was completed," did you have any discussions with</p> <p>20 Town Motors about what those issues were that were</p> <p>21 addressed?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And would you describe those for me?</p> <p>24 A. Sure. So that's when he provided the document</p> <p>25 that showed all of the repairs, and he introduced me to</p>

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<p style="text-align: right;">Page 61</p> <p>1 the mechanic. But we didn't have, I'd say, a fruitful 2 conversation since he was working. He just introduced me 3 and showed me the list of some of the things that were 4 repaired. I don't recall offhand all of the items that 5 were shown to me, but I did see that the transfer case 6 module was repaired, which was my biggest concern at the 7 time. I believe that were O-rings and gaskets and some 8 small parts here and there that were replaced as well. 9 Q. Is it fair to say that based on what you were 10 told by the dealership and the mechanic, that you were 11 comfortable buying the vehicle at that point? 12 A. Yes. 13 Q. Okay. Prior to when you purchased the Cayenne, 14 did you do any research on the website of the National 15 Highway Traffic Safety Administration about the 2012 16 Cayenne S? 17 A. No. 18 Q. Other than the brochure that was given to you by 19 Town Motors, did you review any other marketing brochures 20 about the Porsche Cayenne before you bought the vehicle? 21 A. Yes. 22 Q. Okay. And where did you acquire those? 23 A. On the via Internet via Google. 24 Q. And what did you learn about the vehicle from 25 reviewing those brochures, or what made an impression on</p>	<p style="text-align: right;">Page 63</p> <p>1 Q. Okay. And that conversation occurred prior to 2 when you bought the Cayenne? 3 A. Yes. 4 Q. All right. Did you speak with any other Porsche 5 owners before you bought the vehicle? 6 A. No. 7 Q. Okay. Other than the sales representative we've 8 already talked about, I think you said his first name was 9 William, and the mechanic, did you speak with anybody 10 else at Town Motors while you were in the process of 11 looking at the Cayenne and deciding to acquire it? 12 A. Pre-purchase, no one other than them two and 13 William's manager at the time of sale. 14 Q. Do you remember who William's manager was? 15 A. I can't recall his name. Scott rings a bell, 16 but I couldn't say with confidence. 17 Q. All right. And before you had told me that on 18 one of your visits to Town Motors, you were given the 19 window sticker from the Cayenne? 20 A. Yes. 21 Q. Okay. And is that something that you produced 22 in this case? 23 A. Yes. 24 Q. Okay. 25 A. It was a feature list. I'm not sure if it's</p>
<p style="text-align: right;">Page 62</p> <p>1 you? 2 A. So certainly the fact that it's a Porsche but a 3 family car, you know, a family version of the Porsche. 4 It seemed like it was a car that is capable of even going 5 off-road. It has differential settings that can be 6 locked in and out. So it seemed like it was a true SUV, 7 a sport utility vehicle, that can cover different levels 8 of traction and performance. And, ultimately, that it 9 was a safe, reliable, all-wheel-drive car from a very 10 reputable brand. 11 Q. And before you bought the vehicle, did you have 12 any conversations with other Porsche owners about their 13 experience with Porsche vehicles? 14 A. Yes. 15 Q. Okay. And who was that? 16 A. My godfather. 17 Q. Okay. And tell me about that conversation. 18 A. So he had purchased -- sometime before that, 19 maybe a year before that, he had purchased a used 911 20 Turbo. And he just told me that he was absolutely in 21 love with it. It drives like no other car he's ever 22 driven before. That he was a firm believer in Porsche 23 now, which that was his first Porsche. And it was 24 something that he was really passionate about and really 25 loved and said it was a great car.</p>	<p style="text-align: right;">Page 64</p> <p>1 necessarily a window sticker, but that's what they had to 2 provide me with. 3 Q. Are you familiar with the term Monroney label? 4 A. No. 5 Q. Do you recall when you visited Town Motors 6 whether there was a used car buyer's guard -- sorry, 7 strike that -- a used car buyer's guide posted on the 8 window of the Cayenne? 9 A. No. 10 Q. Did you have any conversations with Town Motors 11 about warranty coverage for the Cayenne? 12 A. Yes. 13 Q. Okay. Tell me about that conversation. 14 A. Sure. So per New Jersey state law, I was 15 informed that there was a minimum of 30-day express 16 warranty for any used car dealership that's mandated. 17 And then buying it from the Porsche dealership, they 18 assured me that if there were any issues, just give them 19 a call, they would take care of it. That the car was 20 fully inspected and that they would stand behind it. 21 Q. Did Town Motors offer to sell you any type of 22 extended warranty coverage for the vehicle? 23 A. Yes. 24 Q. Okay. And tell me about that conversation. 25 A. Sure. So that was at the time of sale. I met</p>

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<p style="text-align: right;">Page 65</p> <p>1 with their finance manager. And, I'm sorry, I don't</p> <p>2 recall his name either. It was just a brief</p> <p>3 conversation, where we went through the financials for</p> <p>4 the purchase as well as the option of the extended</p> <p>5 warranty. They offered the warranty. I believe it was a</p> <p>6 one-year option or a two-year option, depending on which</p> <p>7 plan I wanted. And so I reviewed the documents at that</p> <p>8 time.</p> <p>9 Q. Okay. And did you buy any additional coverage</p> <p>10 for the vehicle?</p> <p>11 A. No.</p> <p>12 Q. Okay. And why not?</p> <p>13 A. The cost was exorbitant, and it was only for, I</p> <p>14 believe, either one year or two years. The cost, if I</p> <p>15 recall correctly, was about \$5,000 or \$6,000. My main</p> <p>16 concern at that time was the transfer case, since that</p> <p>17 was the only issue that I knew was prevalent on the</p> <p>18 vehicle. And in the event that the transfer case failed,</p> <p>19 a repair was roughly \$5,000. And so I just -- I didn't</p> <p>20 think that the cost for one-year protection was worth it,</p> <p>21 especially since I was buying it from a Porsche</p> <p>22 dealership who had performed a multipoint inspection and</p> <p>23 had assured me that the car was up to standard.</p> <p>24 Q. Other than buying extended warranty protection</p> <p>25 from Town Motors, did you do any research on purchasing</p>	<p style="text-align: right;">Page 67</p> <p>1 (The proceedings went off the record, and there</p> <p>2 was a recess taken at 11:32 a.m.)</p> <p>3 (The proceedings went back on the record, and</p> <p>4 the deposition was resumed at 11:40 a.m.)</p> <p>5 BY MR. GOLDBERG:</p> <p>6 Q. Okay. So we're going to show you -- we're going</p> <p>7 to go through some of the documents, sir, that you</p> <p>8 produced in this case. And we're going to start with a</p> <p>9 CARFAX report. And Tim is just marking that. And I</p> <p>10 don't have a ton of questions about this document. But</p> <p>11 why don't you, you know, take the time you need to look</p> <p>12 at it.</p> <p>13 A. Okay.</p> <p>14 Q. Okay. Sir, was this CARFAX report given to you</p> <p>15 by Town Motors before you bought the Cayenne?</p> <p>16 A. Yes.</p> <p>17 Q. And was that during the same visit that you were</p> <p>18 provided the repair inspection documents and what we</p> <p>19 called the window sticker?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And did you review this CARFAX report</p> <p>22 before deciding to buy the vehicle?</p> <p>23 A. Yes.</p> <p>24 Q. Do you recall having any concerns about the</p> <p>25 vehicle based on what you read on the CARFAX report?</p>
<p style="text-align: right;">Page 66</p> <p>1 extended warranty coverage from any other source?</p> <p>2 A. No.</p> <p>3 Q. Okay. So you had told me that the dealership</p> <p>4 told you that under New Jersey law, there was a 30-day</p> <p>5 warranty period that attached to your vehicle at the time</p> <p>6 that you purchased it --</p> <p>7 A. Yes.</p> <p>8 Q. -- is that correct?</p> <p>9 A. Correct.</p> <p>10 Q. In your understanding, after that 30 days</p> <p>11 lapsed, who was responsible for paying for any repairs to</p> <p>12 your Cayenne?</p> <p>13 A. Myself.</p> <p>14 Q. All right.</p> <p>15 MR. GOLDBERG: So we're going to -- we're going</p> <p>16 to look at some more documents now. Before I dive into</p> <p>17 that, is this -- would you like to take your break now?</p> <p>18 THE DEPONENT: Sure. That would be great.</p> <p>19 Thank you.</p> <p>20 MR. GOLDBERG: Okay. We'll take a few minutes</p> <p>21 and then come back. Okay?</p> <p>22 THE DEPONENT: Like, eight minutes? Is that</p> <p>23 okay?</p> <p>24 MR. GOLDBERG: Yeah, 11:40. That's great.</p> <p>25 THE DEPONENT: Okay. Thank you.</p>	<p style="text-align: right;">Page 68</p> <p>1 A. No major concerns, no.</p> <p>2 Q. Okay. If you look at the second page of the</p> <p>3 CARFAX report, which is Vaz-Pocas 17, under "Detailed</p> <p>4 History." About halfway under that, November 16, 2012,</p> <p>5 there is a report of an "Accident reported involving rear</p> <p>6 impact with another motor vehicle. Rear area primarily</p> <p>7 damaged. Vehicle drivable."</p> <p>8 Do you recall seeing that specific entry prior</p> <p>9 to buying the Cayenne?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And did that cause you any concern about</p> <p>12 buying the vehicle?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And did you speak to Town Motors about</p> <p>15 that concern?</p> <p>16 A. I did.</p> <p>17 Q. Okay. And what were you told?</p> <p>18 A. They didn't have any detailed information. But</p> <p>19 I remember they had told me that it was probably a minor</p> <p>20 fender bender. They didn't see any type of structural</p> <p>21 damage. The vehicle was brand new at that time, and</p> <p>22 that, at this point, I guess, it was five years old. And</p> <p>23 no issues had come up in the five years since that</p> <p>24 accident, or maybe four and a half years since that</p> <p>25 accident. So they had told me that it was likely just a</p>